

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,
Plaintiff,

v.

NO: 15-CR-4268 JB

ANTHONY RAY BACA,
CHRISTOPHER GARCIA,

Defendants.

DEFENDANTS' EXHIBIT LIST FOR COUNTS 10-12

COMES NOW, defendants Christopher Garcia through co-counsel, Amy Sirignano of the Law Office of Amy Sirignano, PC, and Christopher W. Adams of the Law Office of Christopher W. Adams, and Anthony Ray Baca through co-counsel Marc M. Lowry of Rothstein Donatelli, LLC, and Theresa M. Duncan, of Duncan Earnest, LLC, and hereby submit the following list of exhibits for Counts 10-12 of the Second Superseding Indictment (Doc. 949), for the convenience of the Court and counsel and without waiving the right to introduce different or additional exhibits, to be used in any phase of the trial.

In addition to the specific exhibits listed below, defendants reserve the right to offer any exhibit admitted at any pretrial hearing in this case, and the right to introduce additional exhibits subsequent to the disclosure and/or review of the 16,000 hours of phone calls recently disclosed, the government's witness list, the government's exhibit list, Jencks materials, and the additional discovery the government has promised, yet

not produced. Defendants reserve the right to amend this exhibit list, if and when any severance of defendants and/or counts is granted.

EXHIBIT	DESCRIPTION	STIPULATED	OFFERED	OBJECTED	ADMITTED
EXHIBIT DA	A&E Behind Bars: Rookie Year. Clips from Takedown: Season 2, Episode 12				
EXHIBIT DB	A&E Behind Bars: Rookie Year. Clips from Takedown: Season 3				
EXHIBIT DC	Christopher Garcia: New Mexico Prescription Monitoring Program, Patient RX History Report				
EXHIBIT DD	Central New Mexico Community College Diploma and Transcripts for Christopher Garcia				
EXHIBIT DE	Christopher Garcia Report from Janine Arvizu regarding DNA Evidence				
EXHIBIT DF	Christopher Garcia Expert DNA Report				

EXHIBIT DG	Christopher Garcia U.S. Probation Records				
EXHIBIT DH	Cellbrite Report of Eric Duran FBI cellphone – SA Nancy Stemo				
EXHIBIT DI	Cellbrite Reports Eric Duran FBI cellphone – defense expert Tim Bryan				
EXHIBIT DJ	Record of civil lawsuit against Gregg Marcantel filed by Eric Duran				
EXHIBIT DK	Mario Montoya, Eric Duran, and Anthony Baca audio of telephone call regarding destruction of Mario Montoya's cell phone				
EXHIBIT DL	Audio of telephone call clips with Chris Garcia, Eric Duran, and Anthony Ray Baca				
EXHIBIT DM	Audio of telephone call clips with Chris Garcia and Mario Montoya				

EXHIBIT DN	Audio of ELSUR recordings between Chris Garcia and Mario Montoya				
EXHIBIT DO	Audio of ELSUR recordings with Eric Duran, Anthony Baca, and/or Christopher Garcia				
EXHIBIT DP	Audio of ELSUR recordings between Eric Duran, Roy Martinez and Anthony Ray Baca				
EXHIBIT DQ	Audio of phone calls between Eric Duran, Roy Martinez and Anthony Ray Baca				
EXHIBIT DR	Audio of ELSUR recordings of Eric Duran, Mario Rodriguez, and Anthony Ray Baca				
EXHIBIT DS	Audio of telephone calls between Eric Duran, Mario Rodriguez, and Anthony Ray Baca				

EXHIBIT DT	Audio of ELSUR recordings of Eric Duran and Anthony Ray Baca				
EXHIBIT DU	Audio of telephone calls of Eric Duran and Anthony Ray Baca				
EXHIBIT DV	Video during NM Legislative Session regarding Gerald Archuleta				
EXHIBIT DW	Christopher Garcia Drug Treatment Records				
EXHIBIT DX	Marcantel Video at PNM North				
EXHIBIT DY	New Mexico State Auditor Report of Audit at New Mexico Department of Corrections				
EXHIBIT DZ	Mario Montoya prior and pending convictions				
EXHIBIT EA	Eric Duran prior and pending convictions				
EXHIBIT EB	Gerald Archuleta prior and pending convictions				
EXHIBIT EC	Robert Martinez prior and				

	pending convictions				
EXHIBIT ED	Timothy Martinez prior and pending convictions				
EXHIBIT EE	Roy Martinez prior and pending convictions				

Respectfully submitted,

/s/

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CERTIFICATE OF SERVICE

I hereby certify that this document was electronically filed using the Court's ECF filing system which disburses copies electronically to parties of record where appropriate on this 12th day of January, 2018.

/s/ Electronically Submitted

Amy Sirignano